



JUL 16 2015

Mr. Douglas Schminke
SFPP, L.P.
1100 Town and Country Road
Orange, CA 92868

**Re: Notice of Minor Title V Permit Modification
District Facility # C-1077
Project # 1151419**

Dear Mr. Schminke:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued C-1077-3-13, '-24-4 and '-54-0 (under project C-1143233) into the Title V operating permit. This project authorized the modification of one 78.0 MMBtu/hr bulk loading vapor combustion system to install a variable frequency drive and flame arrestors, the modification of one 375,000 gallon vapor holder tank to replace the bladder system and the installation of one temporary portable 25,434 gallon vapor holding tank equipped with a bladder system.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued C-1077-3-13, '-24-4 and '-54-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,


Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Sayed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: 1151419

Engineer: Dustin Brown
Date: July 15, 2015

Facility Number: C-1077
Facility Name: SFPP, L.P.
Mailing Address: 1100 Town and Country Road
Orange, CA 92868

Contact Name: Douglas Schminke
Phone: (707) 438-1200

Responsible Official: Douglas Schminke
Title: Director of Operations

I. PROPOSAL

SFPP, L.P. – Fresno Terminal is proposing a Title V minor permit modification to incorporate recently issued Authorities to Construct (ATC's) C-1077-3-13, '-24-4 and '-54-0 (under project C-1143233) into the Title V operating permit. This project is for the modification of one 78.0 MMBtu/hr bulk loading vapor combustion system to install a variable frequency drive and flame arrestors, the modification of one 375,000 gallon vapor holder tank to replace the bladder system and for the installation of one temporary 25,434 gallon vapor holder tank equipped with a bladder system.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

SFPP's Fresno Terminal is located at 4149 Maple Avenue in Fresno, CA.

III. EQUIPMENT DESCRIPTION

C-1077-3-14: 78.0 MMBTU/HR JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM AS THE CONTROL DEVICE OF THE BULK LOADING OPERATION WITH A VARIABLE FREQUENCY DRIVE FOR AIR INTAKE FAN MOTOR AND FLAME ARRESTORS

C-1077-24-5: VAPOR HOLDER TANK, EQUIPPED WITH A 312,235 GALLON NOMINAL (41,740 CUBIC FOOT) "BLADDER SYSTEM" TO CONTROL HYDROCARBON EMISSIONS VENTING TO THE VAPOR BURNER LISTED UNDER PERMIT C-1077-3

C-1077-54-0: 25,434 GALLON (3,400 CUBIC FOOT) VAPOR HOLDER TANK, EQUIPPED WITH BLADDER SYSTEM TO CONTROL HYDROCARBON EMISSIONS VENTING TO THE VAPOR BURNER LISTED UNDER PERMIT C-1077-3

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

SFPP is proposing to modify the existing 78.0 MMBtu bulk loading operation vapor combustion burner by installing a variable frequency drive and flame arrestors.

They are also proposing to modify one existing 375,000 gallon vapor holder tank by replacing the bladder system.

In addition, while the bladder system is being replaced in the 375,000 gallon tank referenced above, the facility will be installing and utilizing a temporary 25,434 gallon vapor holder tank with a bladder system.

All vapors are collected and either temporarily stored in the vapor holder tank to provide surge relief or are sent directly to be controlled by the existing 78.0 MMBtu/hr combustion system. The proposed portable temporary vapor holder tank will be used while maintenance is performed on the existing vapor holder tank. The proposed tank will serve the same purpose as the existing tank. Once maintenance has been completed on the existing tank, the new temporary tank will be removed from service.

C-1077-3-14:

Existing PTO Condition Changes:

There are no changes to the existing PTO conditions associated with this permit unit.

ATC Condition Changes:

ATC condition 1 has been removed and not included in the requirements for this revised permit as SFPP has submitted the appropriate Title V minor modification application to incorporate this ATC in to their Title V operating permit.

C-1077-24-4:

Existing PTO Condition Changes:

There are no changes to the existing PTO conditions associated with this permit unit.

ATC Condition Changes:

ATC condition 1 has been removed and not included in the requirements for this revised permit as SFPP has submitted the appropriate Title V minor modification application to incorporate this ATC in to their Title V operating permit.

C-1077-54-0:

ATC Condition Changes:

ATC condition 1 has been removed and not included in the requirements for this revised permit as SFPP has submitted the appropriate Title V minor modification application to incorporate this ATC in to their Title V operating permit.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permits C-1077-3-14, '-24-5 and '-54-1
- B. Authorities to Construct C-1077-3-13, '-24-4 and '-54-0
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permits C-1077-3-12 and '-24-3

ATTACHMENT A

Proposed Modified Title V Operating Permits
C-1077-3-14, '-24-5 and '-54-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1077-3-14

EXPIRATION DATE: 05/31/2016

EQUIPMENT DESCRIPTION:

78.0 MMBTU/HR JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM AS THE CONTROL DEVICE OF THE BULK LOADING OPERATION WITH A VARIABLE FREQUENCY DRIVE FOR AIR INTAKE FAN MOTOR AND FLAME ARRESTORS

PERMIT UNIT REQUIREMENTS

1. All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Auxiliary fuel supplied to John Zink ZTOF burner/thermal oxidizer shall be monitored daily to determine the amount of fuel consumed. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The John Zink ZTOF burner operating temperature shall be monitored by a continuously recording temperature device. Upon the detection of a vapor combustion temperature below 900 degrees F, the permittee shall investigate the cause of the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2201, 40 CFR part 64] Federally Enforceable Through Title V Permit
4. All vapors from the loading racks shall be incinerated in the vapor combustion system at a minimum temperature of 900 degrees F (averaged over each burn period) and retention time of at least 0.5 seconds when running at by-pass mode or direct mode. [District Rule 2201, 40 CFR part 64 and District Rule 4624] Federally Enforceable Through Title V Permit
5. VOC emissions from the loading racks #1, #2, #3, #4, #5, #6, and #7 served by the John Zink ZTOF combustion system shall not exceed 0.02 pound VOC per 1,000 gallon of organic liquid with greatest vapor pressure loaded. [District Rule 4624] Federally Enforceable Through Title V Permit
6. Daily emission limits from the John Zink ZTOF combustion system shall not exceed any of the following limits: 105.0 pounds VOC per day, 97.0 pounds NOx per day, 264.0 pounds CO per day, 30.7 pounds SOx per day, or 6.0 pounds PM10/day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Records of monthly LPG consumption and the daily and annual amount of gasoline loaded from the loading racks shall be maintained, retained on the premises and made available for District inspection upon request. [District Rule 2201 and District Rule 4624] Federally Enforceable Through Title V Permit
8. Source testing to demonstrate compliance with permit conditions and all rules and regulations shall be conducted annually. [District Rule 4624, District Rule 2201 and District Rule 1081] Federally Enforceable Through Title V Permit
9. Source testing shall be conducted using the methods and procedures approved by the District. A pretest plan outlining the test methods and procedures shall be submitted for the District's approval no later than 15 days prior to each test. [District Rule 1081] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. The operator of the facility shall comply with the provisions of District Rule 4624. [District Rule 4624] Federally Enforceable Through Title V Permit
13. The facility maximum gasoline throughput shall not exceed either of the following limits: 5.25 million gallons per day and 1,916,250,000 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624, 6.2.1 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
15. VOC emissions from the vapor collection and control system shall be determined annually using 40CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 432, or ARB Method 2-4. [District Rule 4624, 6.2.2 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
16. Loading and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624, 5.4 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
17. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4624 and Fresno County Rule 412. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
18. Devices used to monitor the John Zink ZTOF burner operating temperature shall be maintained in accordance with the manufacture's specifications. [40 CFR part 64] Federally Enforceable Through Title V Permit
19. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
20. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR part 64] Federally Enforceable Through Title V Permit
21. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

DRAFT

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1077-24-5

EXPIRATION DATE: 05/31/2016

EQUIPMENT DESCRIPTION:

VAPOR HOLDER TANK, EQUIPPED WITH A 312,235 GALLON NOMINAL (41,740 CUBIC FOOT) "BLADDER SYSTEM" TO CONTROL HYDROCARBON EMISSIONS VENTING TO THE VAPOR BURNER LISTED UNDER PERMIT C-1077-3

PERMIT UNIT REQUIREMENTS

1. The air pollution control measure "bladder system" shall be maintained as per manufacturer's specifications submitted to the District. [District Rule 2201] Federally Enforceable Through Title V Permit
2. There shall be no uncontrolled vapor venting from this tank. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The vapor transfer lines to the vapor recovery unit shall be maintained in a leak tight condition. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All processor and transfer equipment, including vapor transfer lines and connections, must be maintained in proper operating condition at all times. Permittee shall comply with all maintenance instructions associated with vapor control equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Inspections shall be conducted using sight, sound and smell, and instrument methods to detect leak every month to maintain compliance with leak-free condition. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
6. The source shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with EPA Method 21. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
7. Any vapor control device, other than a flare, shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1077-54-1

EXPIRATION DATE: 05/31/2016

EQUIPMENT DESCRIPTION:

25,434 GALLON (3,400 CUBIC FOOT) VAPOR HOLDER TANK, EQUIPPED WITH BLADDER SYSTEM TO CONTROL HYDROCARBON EMISSIONS VENTING TO THE VAPOR BURNER LISTED UNDER PERMIT C-1077-3

PERMIT UNIT REQUIREMENTS

1. The vapor processing system including the use of this permit unit shall be certified by the California Air Resources Board within ten days of implementation. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The air pollution control measure "bladder system" shall be maintained as per manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
3. There shall be no uncontrolled vapor venting from this tank. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The vapor transfer lines to the vapor recovery unit shall be maintained in a leak-free condition. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All processor and transfer equipment, including vapor transfer lines and connections, must be maintained in proper operating condition at all times. Permittee shall comply with all maintenance instructions associated with vapor control equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Inspections shall be conducted using sight, sound and smell, and instrument methods to detect leaks every month to maintain compliance with leak-free condition. [District Rule 2520] Federally Enforceable Through Title V Permit
7. The source shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with EPA Method 21. [District Rule 2520] Federally Enforceable Through Title V Permit
8. Any vapor control device, other than a flare, shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

ATTACHMENT B

Authorities to Construct
C-1077-3-13, '-24-4 and '-54-0



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



AUTHORITY TO CONSTRUCT

PERMIT NO: C-1077-3-13

ISSUANCE DATE: 02/25/2015

LEGAL OWNER OR OPERATOR: SFPP, L.P.
MAILING ADDRESS: 1100 TOWN & COUNTRY ROAD
ORANGE, CA 92868

LOCATION: 4149 S MAPLE AVE
FRESNO, CA 93725

EQUIPMENT DESCRIPTION:

MODIFICATION OF 78.0 MMBTU/HR JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM AS THE CONTROL DEVICE OF THE BULK LOADING OPERATION: INSTALL A VARIABLE FREQUENCY DRIVE AND FLAME ARRESTORS

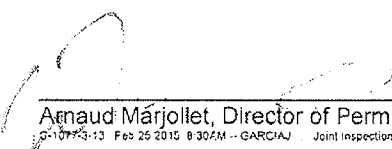
CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Auxiliary fuel supplied to John Zink ZTOF burner/thermal oxidizer shall be monitored daily to determine the amount of fuel consumed. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The John Zink ZTOF burner operating temperature shall be monitored by a continuously recording temperature device. Upon the detection of a vapor combustion temperature below 900 degrees F, the permittee shall investigate the cause of the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2201, 40 CFR part 64] Federally Enforceable Through Title V Permit
5. All vapors from the loading racks shall be incinerated in the vapor combustion system at a minimum temperature of 900 degrees F (averaged over each burn period) and retention time of at least 0.5 seconds when running at by-pass mode or direct mode. [District Rule 2201, 40 CFR part 64 and District Rule 4624] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


Arnaud Marjollet, Director of Permit Services

C-1077-3-13 Feb 26 2015 8:30AM -- GARCIAJ -- Joint Inspection NOT Required

6. VOC emissions from the loading racks #1, #2, #3, #4, #5, #6, and #7 served by the John Zink ZTOF combustion system shall not exceed 0.02 pound VOC per 1,000 gallon of organic liquid with greatest vapor pressure loaded. [District Rule 4624] Federally Enforceable Through Title V Permit
7. Daily emission limits from the John Zink ZTOF combustion system shall not exceed any of the following limits: 105.0 pounds VOC per day, 97.0 pounds NOx per day, 264.0 pounds CO per day, 30.7 pounds SOx per day, or 6.0 pounds PM₁₀/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Records of monthly LPG consumption and the daily and annual amount of gasoline loaded from the loading racks shall be maintained, retained on the premises and made available for District inspection upon request. [District Rule 2201 and District Rule 4624] Federally Enforceable Through Title V Permit
9. Source testing to demonstrate compliance with permit conditions and all rules and regulations shall be conducted annually. [District Rule 4624, District Rule 2201 and District Rule 1081] Federally Enforceable Through Title V Permit
10. Source testing shall be conducted using the methods and procedures approved by the District. A pretest plan outlining the test methods and procedures shall be submitted for the District's approval no later than 15 days prior to each test. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
12. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
13. The operator of the facility shall comply with the provisions of District Rule 4624. [District Rule 4624] Federally Enforceable Through Title V Permit
14. The facility maximum gasoline throughput shall not exceed either of the following limits: 5.25 million gallons per day and 1,916,250,000 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624, 6.2.1 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
16. VOC emissions from the vapor collection and control system shall be determined annually using 40CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 432, or ARB Method 2-4. [District Rule 4624, 6.2.2 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
17. Loading and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624, 5.4 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
18. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4624 and Fresno County Rule 412. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
19. Devices used to monitor the John Zink ZTOF burner operating temperature shall be maintained in accordance with the manufacture's specifications. [40 CFR part 64] Federally Enforceable Through Title V Permit
20. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
21. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR part 64] Federally Enforceable Through Title V Permit
22. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



AUTHORITY TO CONSTRUCT

PERMIT NO: C-1077-24-4

ISSUANCE DATE: 02/25/2015

LEGAL OWNER OR OPERATOR: SFPP, L.P.
MAILING ADDRESS: 1100 TOWN & COUNTRY ROAD
ORANGE, CA 92868

LOCATION: 4149 S MAPLE AVE
FRESNO, CA 93725

EQUIPMENT DESCRIPTION:

MODIFICATION OF 375,000 GALLON VAPOR HOLDER TANK, EQUIPPED WITH MESA RUBBER COMPANY "BLADDER SYSTEM" TO CONTROL HYDROCARBON EMISSIONS: REPLACE THE BLADDER SYSTEM

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. The air pollution control measure "bladder system" shall be maintained as per manufacturer's specifications submitted to the District. [District Rule 2201] Federally Enforceable Through Title V Permit
3. There shall be no uncontrolled vapor venting from this tank. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The vapor transfer lines to the vapor recovery unit shall be maintained in a leak tight condition. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All processor and transfer equipment, including vapor transfer lines and connections, must be maintained in proper operating condition at all times. Permittee shall comply with all maintenance instructions associated with vapor control equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Inspections shall be conducted using sight, sound and smell, and instrument methods to detect leak every month to maintain compliance with leak-free condition. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
7. The source shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with EPA Method 21. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Sayed Sadredin, Executive Director / APCO


Arnaud Marjollet, Director of Permit Services
C-1077-24-4 Feb 25 2015 8:30PM - GARCIA Joint Inspection NOT Required

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726 • (559) 230-5900 • Fax (559) 230-6061

8. Any vapor control device, other than a flare, shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



AUTHORITY TO CONSTRUCT

PERMIT NO: C-1077-54-0

ISSUANCE DATE: 02/25/2015

LEGAL OWNER OR OPERATOR: SFPP, L.P.
MAILING ADDRESS: 1100 TOWN & COUNTRY ROAD
ORANGE, CA 92868

LOCATION: 4149 S MAPLE AVE
FRESNO, CA 93725

EQUIPMENT DESCRIPTION:

25,434 GALLON (3,400 CUBIC FOOT) VAPOR HOLDER TANK, EQUIPPED WITH BLADDER SYSTEM TO CONTROL HYDROCARBON EMISSIONS VENTING TO THE VAPOR BURNER LISTED UNDER PERMIT C-1077-3

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. The vapor processing system including the use of this permit unit shall be certified by the California Air Resources Board within ten days of implementation. [District Rule 2201]
3. The air pollution control measure "bladder system" shall be maintained as per manufacturer's specifications. [District Rule 2201]
4. There shall be no uncontrolled vapor venting from this tank. [District Rule 2201]
5. The vapor transfer lines to the vapor recovery unit shall be maintained in a leak-free condition. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. [District Rule 2201]
6. All processor and transfer equipment, including vapor transfer lines and connections, must be maintained in proper operating condition at all times. Permittee shall comply with all maintenance instructions associated with vapor control equipment. [District Rule 2201]
7. Inspections shall be conducted using sight, sound and smell, and instrument methods to detect leaks every month to maintain compliance with leak-free condition. [District Rule 2520]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


Arnaud Marjollet, Director of Permit Services

C-1077-54-0 - Feb 25 2015 8:30AM - GARCIAJ - Joint Inspection NOT Required

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726 • (559) 230-5900 • Fax (559) 230-6061

8. The source shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with EPA Method 21. [District Rule 2520]
9. Any vapor control device, other than a flare, shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520]

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NO _x	VOC	CO	SO _x	PM ₁₀
ATC C-1077-3-13	0	0	0	0	0
ATC C-1077-24-4	0	0	0	0	0
ATC C-1077-54-0	0	0	0	0	0
TOTAL	0	0	0	0	0

ATTACHMENT D

Application



San Joaquin Valley Air Pollution Control District

www.valleyair.org



MAY 08 2015

Permit Application For:

Permits Services
SJVAPCD

☐ ADMINISTRATIVE AMENDMENT ☒ MINOR MODIFICATION ☐ SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: SFPP, L.P. Fresno Terminal Facility C-1077	
2. MAILING ADDRESS: STREET/P.O. BOX: 1100 Town and Country Road CITY: Orange STATE: CA 9-DIGIT ZIP CODE: 92868	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: 4149 Maple Avenue CITY: Fresno 1/4 SECTION TOWNSHIP RANGE	INSTALLATION DATE: Portable bladder to arrive at the terminal on or about June 8, 2015
4. GENERAL NATURE OF BUSINESS: Petroleum & Chemical Bulk Stations & Terminals for Hire	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Portable vapor bladder in shipping container to be set up on site for use with existing vapor processing system during the replacement of the internal bladder in the existing vapor holder tank. The portable bladder will be disconnected and removed from the site once the new bladder is installed and operational. This is a new permit which will be assigned Permit No: C-1077-54-0.	
6. TYPE OR PRINT NAME OF APPLICANT: Douglas K. Schminke	TITLE OF APPLICANT: Director of Operations
7. SIGNATURE OF APPLICANT: 	DATE: 5-6-2015 PHONE: (707) 438-2100 FAX: () EMAIL: doug_schminke@kindermorgan.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$	CHECK#:
	DATE PAID:	
	PROJECT NO: C-1151419	FACILITY ID: C-1077

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6061



San Joaquin Valley
Unified Air Pollution Control District



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

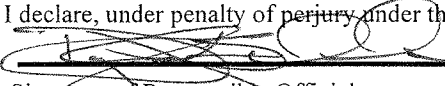
- ☐ SIGNIFICANT PERMIT MODIFICATION ☐ ADMINISTRATIVE
☒ MINOR PERMIT MODIFICATION ☐ AMENDMENT

COMPANY NAME: SFPP, L.P. Fresno Terminal	FACILITY ID: C - 1077
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input checked="" type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: SFPP, L.P.	
3. Agent to the Owner:	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:


Signature of Responsible Official

5-6-2015
Date

Douglas K. Schminke
Name of Responsible Official (please print)

Director of Operations
Title of Responsible Official (please print)



San Joaquin Valley Air Pollution Control District


www.valleyair.org

RECEIVED
MAY 08 2015
HEALTHY
AIR
LIVING

Permit Application For:

Permits Services
SJVAPCD

☐ ADMINISTRATIVE AMENDMENT ☒ MINOR MODIFICATION ☐ SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: SFPP, L.P. Fresno Terminal Facility C-1077	
2. MAILING ADDRESS: STREET/P.O. BOX: 1100 Town and Country Road CITY: Orange STATE: CA 9-DIGIT ZIP CODE: 92868	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: 4149 Maple Avenue CITY: Fresno ¼ SECTION TOWNSHIP RANGE	INSTALLATION DATE: Modifications to Existing Unit to Begin on or about May 11, 2015
4. GENERAL NATURE OF BUSINESS: Petroleum & Chemical Bulk Stations & Terminals for Hire	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Modification of existing John Zink Vapor Combustion System by the installation of a variable frequency drive and flame arrestors. Current Permit No: C-1077-3-12.	
6. TYPE OR PRINT NAME OF APPLICANT: Douglas K. Schminke	TITLE OF APPLICANT: Director of Operations
7. SIGNATURE OF APPLICANT: 	DATE: 5-6-2015 PHONE: (707) 438-2100 FAX: () EMAIL: doug_schminke@kindermorgan.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$	CHECK#: _____
	DATE PAID: _____	
	PROJECT NO: _____	FACILITY ID: _____

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San Joaquin Valley
Unified Air Pollution Control District



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

☐ SIGNIFICANT PERMIT MODIFICATION
☒ MINOR PERMIT MODIFICATION

☐ ADMINISTRATIVE
AMENDMENT

COMPANY NAME: SFPP, L.P. Fresno Terminal	FACILITY ID: C - 1077
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input checked="" type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: SFPP, L.P.	
3. Agent to the Owner:	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

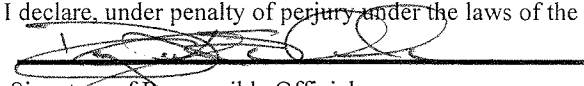
☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).

☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.

☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:


Signature of Responsible Official

5-6-2015
Date

Douglas K. Schminke
Name of Responsible Official (please print)

Director of Operations
Title of Responsible Official (please print)



San Joaquin Valley Air Pollution Control District

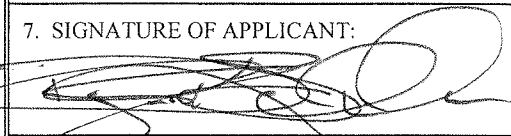
www.valleyair.org



Permit Application For:

Permits Services

[] ADMINISTRATIVE AMENDMENT [x] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: SFPP, L.P. Fresno Terminal Facility C-1077	
2. MAILING ADDRESS: STREET/P.O. BOX: 1100 Town and Country Road CITY: Orange STATE: CA 9-DIGIT ZIP CODE: 92868	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: 4149 Maple Avenue CITY: Fresno ¼ SECTION TOWNSHIP RANGE	INSTALLATION DATE: Modifications to Existing Unit to Begin on or about June 8, 2015
4. GENERAL NATURE OF BUSINESS: Petroleum & Chemical Bulk Stations & Terminals for Hire	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Replacement of the internal bladder in existing vapor holder tank and a change in the equipment description to remove reference to specific bladder vendor. Current Permit No: C-1077-24-3.	
6. TYPE OR PRINT NAME OF APPLICANT: Douglas K. Schminke	TITLE OF APPLICANT: Director of Operations
7. SIGNATURE OF APPLICANT: 	DATE: 5-6-2015 PHONE: (707) 438-2100 FAX: () EMAIL: doug_schminke@kindermorgan.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ CHECK#: DATE PAID: PROJECT NO: FACILITY ID:
------------	---

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San Joaquin Valley
Unified Air Pollution Control District



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- ☐ SIGNIFICANT PERMIT MODIFICATION ☐ ADMINISTRATIVE
☒ MINOR PERMIT MODIFICATION ☐ AMENDMENT

COMPANY NAME: SFPP, L.P. Fresno Terminal	FACILITY ID: C - 1077
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input checked="" type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: SFPP, L.P.	
3. Agent to the Owner:	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:


Signature of Responsible Official

5-6-2015
Date

Douglas K. Schminke

Name of Responsible Official (please print)

Director of Operations

Title of Responsible Official (please print)

Mailing Address: Central Regional Office * 1990 E. Gettysburg Avenue * Fresno, California 93726-0244 * (559) 230-5900 * FAX (559) 230-6061

TVFORM-009
Rev: July 2005

ATTACHMENT E

Previous Title V Operating Permits
C-1077-3-12 and '-24-3

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1077-3-12

EXPIRATION DATE: 05/31/2016

EQUIPMENT DESCRIPTION:

78.0 MMBTU/HR JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM AS THE CONTROL DEVICE OF THE BULK LOADING OPERATION

PERMIT UNIT REQUIREMENTS

1. All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Auxiliary fuel supplied to John Zink ZTOF burner/thermal oxidizer shall be monitored daily to determine the amount of fuel consumed. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The John Zink ZTOF burner operating temperature shall be monitored by a continuously recording temperature device. Upon the detection of a vapor combustion temperature below 900 degrees F, the permittee shall investigate the cause of the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District NSR Rule, 40 CFR part 64] Federally Enforceable Through Title V Permit
4. All vapors from the loading racks shall be incinerated in the vapor combustion system at a minimum temperature of 900 degrees F (averaged over each burn period) and retention time of at least 0.5 seconds when running at by-pass mode or direct mode. [District NSR Rule, 40 CFR part 64 and District Rule 4624] Federally Enforceable Through Title V Permit
5. VOC emissions from the loading racks #1, #2, #3, #4, #5, #6, and #7 served by the John Zink ZTOF combustion system shall not exceed 0.02 pound VOC per 1,000 gallon of organic liquid with greatest vapor pressure loaded. [District Rule 4624] Federally Enforceable Through Title V Permit
6. Daily emission limits from the John Zink ZTOF combustion system shall not exceed any of the following limits: 105.0 pounds VOC per day, 97.0 pounds NOx per day, 264.0 pounds CO per day, 30.7 pounds SOx per day, or 6.0 pounds PM10/day. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Records of monthly LPG consumption and the daily and annual amount of gasoline loaded from the loading racks shall be maintained, retained on the premises and made available for District inspection upon request. [District NSR Rule and District Rule 4624] Federally Enforceable Through Title V Permit
8. Source testing to demonstrate compliance with permit conditions and all rules and regulations shall be conducted annually. [District Rule 4624, District NSR Rule and District Rule 1081] Federally Enforceable Through Title V Permit
9. Source testing shall be conducted using the methods and procedures approved by the District. A pretest plan outlining the test methods and procedures shall be submitted for the District's approval no later than 15 days prior to each test. [District Rule 1081] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. The operator of the facility shall comply with the provisions of District Rule 4624. [District Rule 4624] Federally Enforceable Through Title V Permit
13. The facility maximum gasoline throughput shall not exceed either of the following limits: 5.25 million gallons per day and 1,916,250,000 gallons per year. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624, 6.2.1 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
15. VOC emissions from the vapor collection and control system shall be determined annually using 40CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 432, or ARB Method 2-4. [District Rule 4624, 6.2.2 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
16. Loading and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624, 5.4 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
17. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4624 and Fresno County Rule 412. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
18. Devices used to monitor the John Zink ZTOF burner operating temperature shall be maintained in accordance with the manufacture's specifications. [40 CFR part 64] Federally Enforceable Through Title V Permit
19. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
20. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR part 64] Federally Enforceable Through Title V Permit
21. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1077-24-3

EXPIRATION DATE: 05/31/2016

EQUIPMENT DESCRIPTION:

375,000 GALLON VAPOR HOLDER TANK, EQUIPPED WITH MESA RUBBER COMPANY "BLADDER SYSTEM" TO CONTROL HYDROCARBON EMISSIONS.

PERMIT UNIT REQUIREMENTS

1. The air pollution control measure "bladder system" shall be maintained as per manufacturer's specifications submitted to the District. [District NSR Rule] Federally Enforceable Through Title V Permit
2. There shall be no uncontrolled vapor venting from this tank. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The vapor transfer lines to the vapor recovery unit shall be maintained in a leak tight condition. [District NSR Rule] Federally Enforceable Through Title V Permit
4. All processor and transfer equipment, including vapor transfer lines and connections, must be maintained in proper operating condition at all times. Permittee shall comply with all maintenance instructions associated with vapor control equipment. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Inspections shall be conducted using sight, sound and smell, and instrument methods to detect leak every month to maintain compliance with leak-free condition. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
6. The source shall perform leak inspections at least annually, using a portable hydrocarbon detection instrument in accordance with EPA Method 21. [2520, 9.3] Federally Enforceable Through Title V Permit
7. Any vapor control device, other than a flare, shall demonstrate at least 95% control efficiency as measured by EPA Method 25 at least annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.